

O'BRIEN, BELLAND & BUSHINSKY, LLC

ROBERT F. O'BRIEN (NJ, PA & DC)

MARK E. BELLAND (NJ & PA)

STEVEN J. BUSHINSKY (NJ, NY & PA)

THOMAS F. KARPOUSIS (NJ)

KEVIN D. JARVIS (NJ & NY)

TIMOTHY P. HAGGERTY (NJ)

DAVID F. WATKINS, JR. (NJ & PA)

ANTHONY W. DESTEFANIS (NJ)

ELIZABETH I. DEEGAN (NJ & PA)

MICHAEL J. DELTERGO (NJ, PA, MA & DC)

MATTHEW L. RAZZANO (NJ & PA)

W. DANIEL FEEHAN (NJ & PA)

MATTHEW B. MADSEN (NJ)

DAVID H. LIPOW (NJ & PA)

ATTORNEYS AT LAW

1526 BERLIN ROAD

CHERRY HILL, NEW JERSEY 08003

(856) 795-2181

(888) 609-8300

FAX (856) 795-2182

INTERNET: WWW.OBBBLAW.COM

E-MAIL: OBBLAW.COM



OF COUNSEL

CARL J. MINSTER III (PA, NJ)

DAVID J. J. FACCIOLO (DE, PA)

DAVID R. THIERMAN* (NJ, PA & FL)

* MASTERS OF LAW IN TAXATION

JOAN FREEDMAN MEYER (NJ & PA)

1931-2011

EMAIL: mmadsens@obblaw.com

August 24, 2018

Via ECF and U.S. Mail

Hon. Renee M. Bumb, U.S.D.J.

United States District Court

Mitchell H. Cohen Building & U.S. Courthouse

4th & Cooper Streets, Room 1050

Camden, NJ 08101

**Re: Salvatore, et al. v. A3 Technology, Inc.
Case No. 1:18-cv-09584-R**

Dear Judge Bumb:

This firm represents Plaintiffs in the above referenced matter, in which Plaintiffs are seeking to recover damages related to their employment and discharge from Defendant A3 Technology, Inc. Please accept this communication in response to the Court's August 22, 2018 Order, (Dkt. No. 25) requiring counsel for the parties to confer and submit a status letter to the Court. Counsel for the parties have conferred and discussed the allegations raised in Plaintiff's First Amended Complaint for purposes of streamlining the allegations and to potentially avoid motion practice.

Based on those discussions, Plaintiffs will seek leave to amend the First Amended Complaint to remove certain claims and to add another entity who Plaintiffs believe was acting as a joint employer. Plaintiffs also intend to confer again with counsel for Defendant prior to seeking leave to amend, for the purpose of reviewing the contents of the proposed Second Amended Complaint in a further good faith effort by the parties to avoid motion practice. Due to the upcoming holiday and the need for Plaintiffs counsel to discuss the proposed changes with Plaintiffs, we anticipate on filing for leave to file the Second Amended Complaint pursuant to Local Rule 15.1 no later than September 14, 2018.

Respectfully submitted,
O'BRIEN, BELLAND & BUSHINSKY, LLC

/s/ Matthew B. Madsen, Esquire

David F. Watkins Jr., Esquire
Matthew B. Madsen, Esquire

cc: Colin G. Bell, Esquire (*Via ECF, U.S. Mail*)